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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

YVONNE COX,

Plaintiff,

vs.

CALIFORNIA SECURITY ALARMS, INC.,

Defendants.

NO. C04-02530 SI

STIPULATION TO
RELEASE CONTACT
INFORMATION ON
TREATING THERAPIST;
ORDER THEREON

The parties to the above-entitled action jointly submit this Stipulation to Release Contact Information for the therapist of Plaintiff YVONNE COX in this matter.

WHEREAS: Plaintiff YVONNE COX alleges that her damages in this action include, but are not limited to, emotional distress;

WHEREAS: Plaintiff YVONNE COX was treated by Sarah Ashbrook an undergraduate student therapist at the Community Counseling Center, California State University, East Bay (formerly, California State University, Hayward) located at 22580 Carlos Bee Boulevard, Hayward, California 94542-3076, Telephone: (510) 885-3007, from about June 2004 through

1 May, 2005;

2 WHEREAS: With the parties' stipulation, the court has already ordered the release from
3 the above-named facility of "Any and all Intake Report(s), Progress Notes; Discharge Summary;
4 Verification of Counseling Services; Diagnosis, Modulations, Result of Clinical Testing and
5 Diagnostic Summary, as well as any records which speak to the frequency of treatment fur-
6 nished," and a copy of this order is attached as Exhibit A;

7 WHEREAS: Such records have been produced and show that Plaintiff YVONNE COX
8 was seen approximately 30 times by Ms. Sarah Ashbrook during the time period in question, and
9 that Ms. Ashbrook took detailed notes concerning each visit;

10 WHEREAS: Both parties have been informed that Ms. Ashbrook has graduated from her
11 undergraduate studies as Cal. State East Bay;

12 WHEREAS: Both parties wish to communicate with Ms Ashbrook concerning this case
13 and to ultimately take her deposition, but have thus far been unable to locate her; and

14 WHEREAS: The parties have contacted the Community Counseling Center and were told
15 by Director Terry Soo-Hoo that, although the Community Counseling Center is able to reach Ms.
16 Ashbrook, Cal. State East Bay will release no contact information for Ms. Ashbrook, or to
17 forward any correspondence to her, without a court order.

18
19 **STIPULATION AND ORDER**

20 1. Cal. State East Bay shall release any contact information for Ms. Sarah Ashbrook,
21 including but not limited to most recent telephone number, mailing address, residence address,
22 and name of current employer, if known;

23 2. Said information shall be released to Plaintiff YVONNE COX's legal counsel,
24 Beth W. Mora, Esq. at the Law Offices of Lucius A. Cooper, 18 Crow Canyon Court, Suite 145,
25 San Ramon, California, 94583 within three (3) days of the date of service of the executed Stipu-
26 lation and Order. Plaintiff's counsel shall immediately provide Defendant CALIFORNIA
27 SECURITY ALARMS, INC.'s counsel of record in this matter with a full and complete copy of
28

1 the information and records produced.

2 3. This contact information will be used by the parties only for the purposes of con-
3 ducting discovery in this action.

4 **SIGNATURE OF COUNSEL**

5 DATED: August __, 2005

6 By: /s/
7 BETH W. MORA, ESQ.
8 LAW OFFICES OF LUCIUS A. COOPER
9 Attorneys for Plaintiff

10 DATED: August __, 2005

11 By: /s/
12 H. ANN LIROFF, ESQ.
13 HANNIG LAW FIRM
14 Attorneys for Defendant
15 CALIFORNIA SECURITY ALARMS,
16 INC.

17 **ORDER**

18 IT IS SO ORDERED.

19 DATED: August 3, 2005

20 By:
21 /s/ Susan Illston
22 UNITED STATES DISTRICT JUDGE